APPROVED and SO ORDERED. ENTER: <u>3313514236</u>

## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF WEST VIRGINIA CHARLESTON DIVISION

IN RE: C.R. Bard, INC.,

PELVIC REPAIR SYSTEM PRODUCTS

LIABILITY LITIGATION

MDL No. 2187

Honorable Joseph R. Goodwin

JOSEPH R. GOODWIN UNITED STATES DISTRICT JUDGE

Debra Hawkins and Bobby Hawkins

Plaintiff(s),

v.

CASE NO. 2:14-cv-04221

C.R. Bard, Inc., Pelvic Repair System Products Liability Litigation

Defendant(s).

## MOTION TO TRANSFER MDL

**COME NOW** the plaintiff(s), by and through the undersigned counsel, and move the court to transfer this member case from MDL 2187, In re: C.R. Bard, Inc., Pelvic Repair System Products Liability Litigation, to: MDL 2327 Ethicon, Inc., Pelvic Repair System Products Liability Litigation.

Plaintiff(s) herein filed a Complaint or Short Form Complaint in MDL 2187 against C.R. Bard, Inc. Plaintiff(s) later filed an Amended Short Form Complaint that no longer included C.R. Bard, Inc. or another named defendant in that litigation; included instead, among others, were the following parties from MDL 2327 Ethicon, Inc., Pelvic Repair System Products Liability Litigation.

Because C.R. Bard, Inc. or another defendant named in the Master Complaint, is no longer a named defendant in this member case, Plaintiff(s) respectfully request that the Court: 1) **GRANT** the Plaintiff(s) motion to transfer this civil action from MDL 2187 to MDL 2327; and 2) direct the Clerk to disassociate this civil action as a member case in MDL 2187 and re-associate it with MDL 2327.

Respectfully submitted,

/s/ Derek H. Potts

Derek H. Potts MO #44882 Timothy L. Sifers MO #49386 Patricia L. Campbell MO #60917 The Potts Law Firm, LLP 908 Broadway, 3<sup>rd</sup> Floor Kansas City, MO 64105

Email: dpotts@potts-law.com
Email: tsifers@potts-law.com
Email: pcampbell@potts-law.com
(816) 931-2230 Telephone
(816) 931-7030 Facsimile
Attorneys for Plaintiffs